

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

QINGHUA XIE,)	
)	
Plaintiff,)	
)	
v.)	No. 07 C 7107
)	
ABBOTT LABORATORIES,)	
an Illinois corporation)	
)	
Defendant.)	

PLAINTIFF'S MOTION TO EXTEND DISCOVERY

Now comes the Plaintiff, Qinghua Xie, by and through her attorneys, the Law Offices of Eugene K. Hollander, and for her Motion to Extend Discovery, states as follows:

1. This is an employment discrimination case, wherein Plaintiff alleges that she was discriminated against based on her race, national origin and age, in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-2, 42 U.S.C. § 1981 and 29 U.S.C. § 621 et seq. Plaintiff also has alleged that Defendant violated her rights under the Family and Medical Leave Act of 1993, 29 U.S.C. § 101, et seq. and retaliated against her in violation of Title VII and 42 U.S.C. § 1981. Abbott denies Plaintiff's allegations.

2. On July 14, 2008, the parties filed a joint motion to strike the discovery deadlines and schedule a settlement conference with Magistrate Judge Nolan. This Court granted the parties' motion in part, referring the case to Judge Nolan and re-setting the discovery cutoff date for September 2, 2008.

3. The settlement conference is scheduled for September 11, 2008, the first date that both parties and Judge Nolan are available.

4. In order to allow the parties to fully exhaust their settlement possibilities, Plaintiff requests that this Court extend the discovery cutoff by 45 days, through and including October 17, 2008.

7. Counsel for Defendant does not object to the proposed extension of the discovery cutoff date.

8. This Motion is not interposed for purposes of delay, but is made in good faith and will not prejudice either party.

WHEREFORE, Plaintiff, Qinghua Xie, respectfully requests that this Court enter an Order:

a) Extending the discovery cutoff date by 45 days, from September 2, 2008, to and including October 17, 2008;

b) Extend the dispositive motion deadline by 45 days, from September 30, 2008 through and including November 14, 2008.

Respectfully submitted,

Plaintiff,
Qinghua Xie

By: s/ Paul W. Ryan
One of his attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused copies of the foregoing **Plaintiff's Motion To Extend Discovery** to be served upon the following by electronically filing same on this 13th day of August 2008 before 5:00 p.m.

David E. Morrison
Jon E. Klinghoffer
Matthew K. Organ
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s/ Paul W. Ryan